

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Docket No. 20-cr-10012-IT
)	
)	
PAUL BATEMAN)	
)	

ASSENTED-TO MOTION TO MODIFY PRETRIAL RELEASE CONDITION

Now comes the defendant Paul Bateman and hereby moves to modify his pretrial release condition with respect to internet and device usage for certain discrete and specified purposes. After consultation with U.S. Probation and with the assent of the government, Mr. Bateman moves to modify the condition as described below in Attachment A to the Order Setting Conditions of Release. (*See* D.E. #9).

The condition in Attachment A as presently ordered, reads: “Defendant is not to access the internet or possess any computer or other device capable of connecting to the internet; all devices capable of accessing the internet must be password protected and Defendant shall have no access to them.” After consultation with Mr. Bateman’s supervising pretrial services officer, he moves to modify this condition to read instead:

The defendant is not to access the internet or possess any computer or other device capable of connecting to the internet unless authorized by U.S. Probation and Pretrial Services for an expressly approved purpose, such as attending virtual court appearances, telehealth appointments, and attorney/legal meetings; all devices capable of accessing the internet must be password protected and Defendant shall have no access to them.

This modification would permit Mr. Bateman to appear for virtual court dates, to confer and meet with counsel in remote meetings necessitated by the ongoing COVID-19 pandemic, and to participate in any necessary telehealth appointments with the approval of U.S. Probation and

Pretrial Services. Mr. Bateman has been supervised on conditions of release for nearly the past two years and has been in compliance. Pursuant to Local Rule 7.1, counsel conferred with the government and understands that the government assents to this motion.

Respectfully submitted,
PAUL BATEMAN
By His Attorney,

/s/ Sandra Gant
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CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on December 15, 2021.

/s/ Sandra Gant
Sandra Gant